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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALLERGAN USA, INC., and  
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC., MEDICIS  
PHARMACEUTICAL CORP., VALEANT  
PHARMACEUTICALS NORTH AMERICA LLC,  
VALEANT PHARMACEUTICALS  
INTERNATIONAL, and VALEANT  
PHARMACEUTICALS INTERNATIONAL, INC.

Defendants.

Case No. 8:13-cv-01436 AG (JPRx)

**DECLARATION OF WILLIAM F. CAVANAUGH**

I, William F. Cavanaugh, declare as follows:

1. I am a member of the law firm Patterson Belknap Webb & Tyler LLP, attorneys for the Defendants in the above-captioned case. I am admitted to practice in the State of California.

2. Attached hereto as Exhibit 1 is a true and correct copy of Ahmet Tezel & Glenn H. Frederickson, The science of hyaluronic acid dermal fillers, 10 J. Cosmetic Laser Therapy 35 (2008).

3. Attached hereto as Exhibit 2 is a true and correct copy of VAL0059980-85, U.S. Patent No. 6,521,223 (published Feb. 18, 2003).

4. Attached hereto as Exhibit 3 is a true and correct copy of VAL0060472-76, U.S. Patent No. 7,902,171 (published Mar. 8, 2011), the equivalent of WO 2005/067944 (issued July 28, 2005).

5. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No. 8,124,120 B2 (published Feb. 28, 2012).

6. Attached hereto as Exhibit 5 is a true and correct copy of VAL0060006-25, the verified English translation of WO 96/33751 (issued Oct. 31, 1996).

1                   7. Attached hereto as Exhibit 6 is a true and correct copy of VAL0060285-92, U.S.  
2 Patent. App. 2006/0194758 (published Aug. 31, 2006).

3                   8. Attached hereto as Exhibit 7 is a true and correct copy of the November 9, 2011  
4 Response to Office Action concerning U.S. Patent No. 8,450,475 B2 (“the ‘475 Patent”).

5                   9. Attached hereto as Exhibit 8 is a true and correct copy of the January 30, 2012  
6 Office Action concerning the ‘475 Patent.

7                   10. Attached hereto as Exhibit 9 is a true and correct copy of the July 30, 2012  
8 Response to Office Action concerning the ‘475 Patent.

9                   11. Attached hereto as Exhibit 10 is a true and correct copy of the November 19,  
10 2012 Office Action concerning the ‘475 Patent.

11                   I declare, under penalty of perjury, that the foregoing statements are true and  
12 correct.

13 Date: June 13, 2014

/s/ William F. Cavanaugh, Jr.  
William F. Cavanaugh, Jr.  
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